

November 20, 2012

Office of the Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

Re : CG Docket Nos. 03-123 and 10-51

Sirs,

We at the Orange County Deaf Advocacy Center want to repeat the expression of our support for the efforts and ambition by the Federal Communications Commission (FCC) to control the costs; combat fraud, waste, and abuse; and restore the integrity of the Video Relay Service (VRS) industry.

Access to VRS services can be accomplished through free interoperable open source software that can be used to access any of the VRS providers plus the same software can access an iTRS database for user verification and connectivity purposes. VRS companies can innovate the software applications and consumers can use whichever application they are comfortable with. Also access can be accomplished through off the shelf hardware that can be acquired in bulk and offered by non-profits serving the deaf communities. Both off the shelf software and hardware are very inexpensive nowadays even to consumers who receive monthly stipends from the government.

The reimbursement rates paid to VRS companies are far too generous already and it is very appropriate that the taxpayers be given some relief and the TRS funds be given additional stability with a modest rate cut of at least 30% to bring it closer to the rate standards set for the text based relay services.

We would like to offer a suggestion that is to include a “self-sustainability” clause that would allow VRS companies to innovate self sustainability modules within their own VRS applications to pave the way toward their independence from taxpayer funding. It is my belief that once the VRS industry achieves self-sustainability, the deaf community will be able to offer greater encouragement of growth of the VRS industry once again.

Future FCC notices should be available in American Sign Language (ASL) due to the fact that the signing deaf community has a very high illiteracy rate and are being taken advantage of by companies producing propaganda videos that misinterpret the FCC notices.

Finally, the deaf community does not need to be placed in panic mode especially after seeing propaganda videos by representatives of a single VRS company and therefore FCC should consider a timetable to encourage VRS companies to convert into non-profit organizations sometime in the near future.

Yours in sincere,

Richard Roehm
Chairman

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